

**CYRUS JOUBIN, ESQ.**

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April 25, 2024

**VIA ECF**

Honorable Paul A. Engelmayer  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007


Re: Dashaun Outlaw v. City of New York, et al., 22 cv 9288 (PAE)

Dear Judge Engelmayer:

As Plaintiff's counsel in this matter, I respectfully write to seek the Court's leave to serve a *Touhy* request and subpoena upon the United States Marshals Service ("USMS"). Defendant City consents to this request. Because an initial conference has not been held and formal discovery not yet begun, Plaintiff requires the Court's leave before seeking such limited discovery. In this case, Plaintiff's *Touhy* request / subpoena asks for all USMS documents pertaining to the apprehension of Christopher Jones (a wanted, third-party individual) on December 31, 2021. The Fourth Amendment violations Plaintiff alleges in this lawsuit involve USMS members – specifically, from the Regional Fugitive Task Force – acting alongside NYPD officers in apprehending Christopher Jones on that date. Through this *Touhy* request, Plaintiff seeks to learn the identities of all law enforcement officers who entered his apartment on December 31, 2021 so that he can accurately and timely amend the complaint to name them.

Thank you for your time and attention to this matter.

Respectfully submitted,



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Cyrus Joubin, Esq.  
Attorney for Plaintiff

Granted.



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PAUL A. ENGELMAYER  
United States District Judge  
April 29, 2024.